

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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IN RE NEWELL BRANDS INC.  
SECURITIES LITIGATION

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) Civil Action No. 18-cv-10878 (JMV)  
) (JBC)  
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**~~PROPOSED~~ ORDER GRANTING  
JOINT MOTION FOR SCHEDULING ORDER**

This matter having come before the Court on the Joint Motion for Scheduling Order (the “Joint Motion”) submitted by Defendants Newell Brands Inc., Michael B. Polk, Ralph J. Nicoletti, and James L. Cunningham, III (collectively, “Defendants”) and Lead Plaintiff Hampshire County Council as Administering Authority of the Hampshire County Council Pension Fund (“Lead Plaintiff”), and good cause to grant the Joint Motion appearing, the Court  

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HEREBY ORDERS as follows:

1. The Joint Motion is GRANTED.
2. Defendants are hereby relieved from any obligation to respond to the complaints originally filed in *Bucks County Employees Retirement Fund v. Newell Brands Inc., et al.*, No. 2:18-cv-10878-JMV-JBC, Dkt. No. 1, and *Barnett v. Newell Brands Inc., et al.*, No. 2:18-cv-11132-JMV-JBC, Dkt. No. 1.
3. Lead Plaintiff shall file a consolidated complaint on or before November 28, 2018.

4. Defendants shall move to dismiss, answer, or otherwise respond to the consolidated complaint on or before January 28, 2019.

5. In the event that Defendants file a motion to dismiss, Lead Plaintiff shall file its opposition to the motion to dismiss the consolidated complaint on or before March 14, 2019.

6. Should Lead Plaintiff oppose a motion to dismiss, Defendants shall file their reply brief in further support of the motion to dismiss the consolidated complaint on or before April 12, 2019.

7. In the event that Defendants' file a motion to dismiss the consolidated complaint and the motion to dismiss is denied in whole or in part, Defendants shall have 45 days from the date of the Court's order denying the motion to dismiss to file an answer to the consolidated complaint.

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SO ORDERED, this 5<sup>th</sup> day of October, 2018.



~~The Honorable John Michael Vazquez~~  
~~United States District Judge~~

Hon. James B. Clark, III, USMT